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U.S. Department of Justice

Washington, DC 20530

Amendment to Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS. File this amendment form for any changes to a registration. Compliance is accomplished by filing an electronic amendment to registration statement and uploading any supporting documents at https://www.fara.gov.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 et seq., for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: https://www.fara.gov. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: https://www.fara.gov.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503

Ĵu	Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503				
1.	Name of Registrant	2. Registration No.			
Keystone Strategic Advisers, LLC		6494			
3.	This amendment is filed to accomplish the following indica	ated purpose or purposes:			
	To give a 10-day notice of change in information as req	juired by Section 2(b) of the Act.			
	To correct a deficiency in	·			
	☐ Initial Statement				
	Supplemental Statement for the period ending				
	Other purpose (specify)				
	☐ To give notice of change in an exhibit previously filed.	· .			
4.	If this amendment requires the filing of a document or docu Revised Registration Statement Attachment to Exhibit B Revised Exhibit C	iments, please list:			
5.	Each item checked above must be explained below in full dof the item in the registration statement to which it pertains	letail together with, where appropriate, specific reference to and identity at (If space is insufficient, a full insert page must be used.)			
	sold his interest to Vladimir Petrovic, who has sole owners provided any services to the foreign principal. As such, Mitthroughout this Amendment. The related items (5 and 6) Registration Statement, and the Short Form Registration Stilling an Amended Exhibit C showing the transfer of owners.	rtner, owner, officer, or otherwise in control of the Registrant, having ship and control of the Registrant. Further, Mr. Mittleman has not r. Mittleman has been removed from the Registration Statement of the Registration Statement have been amended in the attached Statement of Mr. Mittleman is hereby withdrawn. Registrant is also ership. Further, Registrant inadvertently failed to attach the to its Exhibit B. Registrant hereby files an amended Exhibit B with			

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EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)		(Print or type name under each signature or provide electronic signature 1		
December 22, 2017			/s/ Vladimir Petrovic	eSigned
				
			·	
	-11	•		
<u>, </u>				

This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

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Registration Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

I–REGISTI	RANT	
1. Name of Registrant	6494	· •
Keystone Strategic Advisers, LLC		
2. Registration No. (To Be Assigned By the FARA Registration Unit)	:	
6494		•
3. Principal Business Address 2329 Porter St. NW Washington, DC 20008		
wasmigton, DC 20006		
4. If the registrant is an individual, furnish the following information:	•	
(a) Residence address(es)		
		•
(h) Other himining address (six) if any		
(b) Other business address(es), if any		
(c) Nationality		
(d) Year of birth		
(e) Present citizenship		
(f) If present citizenship not acquired by birth, state when, where and	d how acquired	
(g) Occupation		
5. If the registrant is not an individual, furnish the following informatio		_
(a) Type of organization: Committee Association Corporation	Partnership Other (specify) LLC	Voluntary group
(b) Date and place of organization 08/27/2015; Delaware		
(c) Address of principal office 2329 Porter St. NW Washington, DC 20008		
(d) Name of person in charge Vladimir Petrovic		
(e) Locations of branch or local offices N/A		·
(f) If a membership organization, give number of members N/A		

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(g) List all partners, offi	cers, directors or persons performing	the functions of an officer of	or director of the registrant.
Name Vladimir Petrovic	Residence Address(es) 2329 Porter St. NW Washington, DC 20008	Position Owner	Nationality Serbian Citzen; U.S. Permanent Resident
•	-		
			•
(h) Which of the above in Vladimir Petrovic	named persons renders services direc	tly in furtherance of the inte	rests of any of the foreign principals?
(i) Describe the nature of Political and communi	of the registrant's regular business or cations consulting	activity.	
	ement of the ownership and control of sole owner and member of Keysto		·
	·		
	ender services to the registrant direct etarial, or in a related or similar capa		ests of any of the foreign principals in
Name Vladimir Petrovic	Residence A 2329 Porter St. NW Washington, DC 2000	Stra	Nature of Services tegic political and communications sulting

<u>.</u>			(PAG	
	IIFOREI	GN PRINCIPAL	<u> </u>	
7. List every foreign principal for w	hom the registrant is acting	or has agreed to act.		
Foreign Principal		Principal Address(es	;)	
Governor of Eastern Libya Omar Almouktar St 10				
•		Benghazi, Libya		
•				
	•			
	IIIA	CTIVITIES		
8: In addition to the activities describ	bed in any Exhibit B to this	statement, will you engage or are you enga	ging now in activity on	
your own behalf which benefits a			, ,	
If yes, describe fully.	, ,		•	
,,,,,,,				
·				
		•		
	·	,		
<u> </u>	THE THREE A DICTE	T THEODY ATTON		
	IVFINANCIA	L INFORMATION	•	
9. (a) RECEIPTS-MONIES				
		obligation to register ² to the time of filing on contribution, income, or money either a		
	yes ⊠ No □	iny contribution, income, or money either a	s compensation or for	
		r each such foreign principal an account of	such monies 3	
ii yes, see isim eelew iii die iede	med detail and separately to	· · · · · · · · · · · · · · · · · · ·	sach monies.	
Foreign Principal	Date Received	Purpose	Amount	
Governor of Eastern Libya	11/21/2017	Advance payment for service fees	\$450,000.00	
•				
			•	

\$450,000.00

Total

¹ The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party; foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

² An agent must register within ten days of becoming an agent, and before acting as such.

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

receive from		s prior to the date of your obl amed in Item 7 anything of v Yes ☐ No ☑	value ⁵ other than money, either as c	
If yes, furnis	h the following informa	ution:		
Foreign Prin	cipal	Date Received	Thing of Value	Purpose
(a) DISBUR	SEMENT-MONIES			
			igation to register to the time of fill with your activities on behalf of any	
	rth below in the required	d detail and separately for each	ch such foreign principal named inc	cluding monies transmitt
Date		To Whom	Purpose	Amount
		,		
	SEMENTS-THINGS			
During the pi dispose of an principal nam	eriod beginning 60 days by thing of value ⁸ other ned in Item 7? Yes	s prior to the date of your obl than money in furtherance of ☐ No ☒	igation to register? to the time of fill or in connection with your activity	ling this statement, did yo
During the pi dispose of an principal nam	eriod beginning 60 days by thing of value ⁸ other t	s prior to the date of your obl than money in furtherance of ☐ No ☒	igation to register ⁷ to the time of fill or in connection with your activiti	ling this statement, did yo es on behalf of any foreig
During the pi dispose of an principal nam	eriod beginning 60 days by thing of value ⁸ other ned in Item 7? Yes	s prior to the date of your obl than money in furtherance of ☐ No ☒	or in connection with your activity	ling this statement, did yo es on behalf of any foreig Purpose
During the pi dispose of an principal nan If yes, furnish	eriod beginning 60 days by thing of value ⁸ other to ned in Item 7? Yes to the following information	s prior to the date of your oblethan money in furtherance of □ No ⊠	or in connection with your activity	es on behalf of any foreig
During the pi dispose of an principal nan If yes, furnish	eriod beginning 60 days by thing of value ⁸ other to ned in Item 7? Yes to the following information	s prior to the date of your oblethan money in furtherance of □ No ⊠	or in connection with your activity	es on behalf of any forei
During the pi dispose of an principal nan If yes, furnish	eriod beginning 60 days by thing of value ⁸ other to ned in Item 7? Yes to the following information	s prior to the date of your oblethan money in furtherance of □ No ⊠	or in connection with your activity	es on behalf of any forei
During the p dispose of an principal nan If yes, furnish Date	eriod beginning 60 days by thing of value ⁸ other ned in Item 7? Yes the following information Recipient SEMENTS-POLITIC	s prior to the date of your oblethan money in furtherance of No 🗵 on: Foreign Principal	or in connection with your activity Thing of Value	es on behalf of any forei
During the p dispose of an principal nan If yes, furnish Date (c) DISBUR During the p the registrant your own bel	eriod beginning 60 days by thing of value ⁸ other and in Item 7? Yes the following information Recipient SEMENTS-POLITIC Beriod beginning 60 days are, or any short form regin	is prior to the date of your oblithan money in furtherance of No Son: Foreign Principal AL CONTRIBUTIONS is prior to the date of your oblitstrant, make any contribution an election to any political of	or in connection with your activity	Purpose ing this statement, did yo
During the p dispose of an principal nan If yes, furnish Date (c) DISBUR During the p the registrant your own bel caucus held t	eriod beginning 60 days by thing of value ⁸ other and in Item 7? Yes the following information Recipient SEMENTS-POLITIC ceriod beginning 60 days to or any short form reginal fin connection with a	AL CONTRIBUTIONS sprior to the date of your oblination money in furtherance of No in the No in	Thing of Value Thing of Value igation to register to the time of file of money or other thing of value iffice or in connection with any prim	Purpose ing this statement, did yo
During the p dispose of an principal nan If yes, furnish Date (c) DISBUR During the p the registrant your own bel caucus held t	eriod beginning 60 days by thing of value ⁸ other and in Item 7? Yes the following information Recipient SEMENTS-POLITIC eriod beginning 60 days and of the connection with a o select candidates for a	Foreign Principal AL CONTRIBUTIONS a prior to the date of your oblination of the date of your oblination and election to any political of any political office? Yestion:	Thing of Value Thing of Value igation to register to the time of file of money or other thing of value iffice or in connection with any primes \(\sum \) No \(\sum \)	Purpose ing this statement, did yo

^{4, 6, 7} and 9 See Footnote 2, on page 3.

⁵ and 8 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

<u> </u>			·
	V-INFORMAT	ΓΙΟΝΑL MATERIALS ¹⁰	·
11. Will the activities of the reg		n principal include the preparation of	r dissemination of informational
IF YES, RESPOND TO TH	È REMAINING ITEMS IN T	THIS SECTION V.	,
12. Identify each such foreign p	rincipal.	· · · · · · · · · · · · · · · · · · ·	
N/A			
13. Has a budget been establish informational materials?	ed or specified sum of money Yes	allocated to finance your activities in	n preparing or disseminating
If yes, identify each such for	reign principal, specify amour	nt and for what period of time.	
N/A		•	
	,	·	
•			
14. Will any public relations firm Yes □ No [pate in the preparation or dissemination	on of such informational materials
			. •
if yes, furnish the names and	d addresses of such persons or	Tirms.	
		·	
15. Activities in preparing or di	sseminating informational ma	terials will include the use of the foll	owing:
☐ Radio or TV broadcasts	☐ Magazine or newspaper	☐ Motion picture films	☐ Letters or telegrams
☐ Advertising campaigns	☐ Press releases	☐ Pamphlets or other publications	Lectures or speeches
Other (specify) N/A			
Electronic Communications			
☐ Email			
Website URL(s):	\.		
Other (specify) N/A			•
16. Informational materials will	be disseminated among the fo	·_ · · · · · · · · · · · · · · · · · ·	
☐ Public officials☐ Legislators		☐ Civic groups or associations ☐ Libraries	•
☐ Government agenc	ies ·	☐ Educational groups	
☐ Newspapers	140	Nationality groups	
☐ Editors	,	Other (specify) N/A	
17. Indicate language to be used	in the informational materials	2.	
English	in ale illiornational material:	other (specify) N/A	•
~	_		

¹⁰ The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI--EXHIBITS AND ATTACHMENTS

- 18. (a) The following described exhibits shall be filed with an initial registration statement:
 - Exhibit A- This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 7.
 - Exhibit B- This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.
 - (b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).
 - (c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

VII--EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)	(Print or type name under each signature or pro	vide electronic signature
December 22, 2017	/s/ Vladimir Petrovic	eSigned

¹¹ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.